

RECEIVED

NOV 04 1999

EIS000371

5 MS. ZIMMERMAN: My name is Susan Zimmerman. I'm
6 making a statement on behalf of Robert Loux, the executive
7 director of the State of Nevada's Agency for Nuclear
8 Project, which is under the governor's office.

9 In order for the people to participate in
10 the National Environmental Policy Act process, they first
11 must be afforded the opportunity to know that a major
12 proposed federal action has a potential to impact them and
13 their communities. While the US Department of Energy is
14 conducting public hearings in various communities in Nevada
15 and around the country, DOE has made no effort to inform
16 citizens and public officials of the relevance of the Draft
17 Environmental Impact Statement to them, their states, and
18 communities.

1...

19 | The notice for this public hearing, for
20 example, refer only to a Draft EIS for a radioactive waste
21 repository at Yucca Mountain, Nevada. They do not indicate
22 that people in Inyo and San Bernardino counties and other
23 parts of California stand to be significantly impacted by
24 radioactive waste shipments as a direct result of Yucca
25 Mountain. One can only conclude that such an oversight is

1

1 cont. 1 intentional and designed to suppress public interest in the
2 project and participation in the public hearings. |

3 Not only is the noticing of these public
2 4 hearings deficient, but |the Draft EIS itself fails to
5 identify the cross-country rail and truck routes used in
6 DOE's transportation impact analysis and fails to identify
7 potential transportation routes to Yucca Mountain through
8 California. The document further fails to provide a
9 meaningful analysis of the potential impacts on California
10 of this rail and truck transportation. |

11 A 1996 study prepared for the State of
12 Nevada by Planning Information Corporation identified
6... 13 routes to Yucca Mountain through California which might be
14 used by DOE and its contractors. Under this approach, the
15 most likely east-west highway corridors would be I-44 from
16 Missouri to Oklahoma, I-40 from Tennessee to California,
17 and I-15 from California to Nevada. The most likely
18 east-west rail corridor would be the Santa Fe-Burlington
19 Northern line from Kansas City to San Bernardino,
20 connecting with the Union Pacific from San Bernardino to
21 Nevada.

22 Using the shipment numbers in the Draft EIS
23 and routing study prepared for the State of Nevada, we
24 determined -- developed a preliminary estimate of the
25 potential legal-weight truck shipments through California

6 cont. 1 to Nevada. 74,000 truck shipments, about three-quarters of
2 the total amount, could traverse Southern California under
3 DOE's mostly truck scenario. There could be an average of
4 five truck shipments through California every day, seven
5 days a week, for decades.

3 6 [The DEIS evaluates a mostly truck scenario
7 and a mostly rail scenario. Nevada believes that the Final
8 EIS must evaluate a third transportation scenario based on
9 the current transportation capabilities of reactors and
10 storage sites. Under this current capabilities scenario,
11 there could be more than 26,000 truck shipments and more
12 than 9,800 rail shipments through California. California
13 would receive an average of two truck shipments per day and
14 four to five rail shipments per week for decades.

15 This potential level of shipments through
16 California certainly constitutes a significant impact which
17 should have been identified and evaluated in the Draft EIS.

4... 18 [Nevada believes that DOE has violated the
19 National Environmental Policy Act by concealing crucial
20 information used in the Draft EIS. Absent this
21 information, persons affected by the transportation impacts
22 of the proposed action have no way of determining the legal
23 sufficiency of DOE's analysis. Moreover, DOE's attempted
24 concealment of the shipment route is a deviation from DOE's
25 past practice of identifying the most likely transportation

4 cont. 1 routes in other NEPA documents, such as the EIS and
2 supplemental EIS for the WIPP site. This action can only
3 further diminish public confidence in DOE's ability to
4 safely transport these highly radioactive materials. |

5 The State of Nevada will be submitting
6 extensive comments on this Draft EIS for a high-level
5 7 nuclear waste repository at Yucca Mountain. | It is our hope
8 that these comments and those of all others will be
9 seriously considered and that a reasonable no-action
10 alternative, as opposed to the unreasonable ones contained
11 in the draft document currently, is selected as a preferred
12 action in the Final Environmental Impact Statement. |

13 Thank you.

14 THE FACILITATOR: Ray Sisson.

H